

CATHERINE FERRARO,

Plaintiff,

V.

KILOLO KIJAKAZI, ACTING
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO.
2:23-cv-00575-ART-BNW

**CONSENT MOTION
FOR EXTENSION OF TIME TO FILE
PLAINTIFF'S BRIEF**

Plaintiff, Catherine Ferraro by her attorney, moves for a sixty (60) day extension of time to file Plaintiff's opening brief by September 15, 2023. Plaintiff's opening brief is currently due to be filed July 17, 2023.

Counsel requests this extension due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For instance, between July 14, and September 14, 2023, staff in Counsel's office have two hundred and thirty-nine (239) Plaintiff briefs due. This figure does not include Oral Arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the various other tasks which arise throughout the course of litigation. These circumstances do not allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not cause Defendant any undue

1 hardship. This extension is needed to thoroughly and properly prepare the brief by the current
2 deadline.

3 Wherefore, Plaintiff requests an extension from July 17, 2023, up to and including
4 September 15, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's
5 Counsel who kindly consents to this request.
6

7 Dated July 13, 2023.

8 Respectfully submitted,

9 /s/Hal Taylor

10 Hal Taylor, Esq.

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12 **Plaintiff's Certificate of Service:**

13 I certify that I caused the Unopposed Motion for Extension of Time to be served today,
14 July 13, 2023, by CMECF to Blaine T. Welsh, Esq., and Oscar Gonzalez, Esq., who are filing
15 users of the CM/ECF system.
16

17 /s/Hal Taylor

18 Hal Taylor

19
20 **ORDER**

21 **IT IS SO ORDERED**

22 **DATED:** 9:52 am, July 14, 2023

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24 

25 **BRENDA WEKSLER**
26 **UNITED STATES MAGISTRATE JUDGE**
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